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CONNERS • BERRY PLC

Jon E. Hastings
(615) 252-2306
Fax (615) 252-6306
Email jhastings@boultcummings.com

December 15, 2003

Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re: Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Loop and Transport)
Docket No. 03-00527

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Dear Chairman Tate:

Enclosed please find the original plus fourteen (14) copies of MCImetro Access Transmission Services, Inc. Brooks Fiber Communications of Tennessee, Inc. and MCI WorldCom Communications, Inc. (collectively "MCI") Supplemental Responses to BellSouth's First Set of Interrogatories in the above-referenced docket.

Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Jon E. Hastings

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Implementation of the Federal)	
Communications Commission's)	Docket No. 03-00527
Triennial Review Order – 9 Month)	
Proceeding – Loop and Transport)	

**MCI's SUPPLEMENTAL RESPONSES TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES (Nos. 1-13)**

MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc. and MCI WorldCom Communications, Inc.¹ (hereinafter collectively referred to as "MCI"), hereby files the following supplemental responses to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories. MCI's initial responses and objections were filed with the Tennessee Regulatory Authority on November 26, 2003 ("MCI's Responses"). The supplemental responses are made subject to the objections contained in MCI's Responses. Pursuant to the protective agreement between BellSouth and MCI, MCI has provided certain confidential information identified below to BellSouth.

INTERROGATORY 1. Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 2 51 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from

¹ Brooks Fiber Communications of Tennessee, Inc. and the local exchange operations of MCI WorldCom Communications, Inc. will be merged into MCImetro Access Transmission Services, LLC on or about January 2, 2003.

third parties, should not be included in this response.

Sample Form for Response to Question 1									
	AL	FL	GA	KY	LA	MS	NC	SC	TN
Affirm									
Deny									

MCI's SUPPLEMENTAL RESPONSE: Without waiving its objections to this interrogatory, MCI has provided BellSouth with a list of its "On-Net" collocations. This list identifies the BellSouth wire center buildings that are physically on the network owned by MCI. Once traffic is delivered to MCI at any of its on-net collocation sites it can be delivered to any other MCI on-net collocation locations without leaving MCI's network. MCI engineers its network to provide services to end user customers. MCI does not engineer its network to move traffic between points on other carriers' (e.g., ILECs') networks.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

INTERROGATORY 4(e) and (f). For each state in Question 1 that you answered in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.

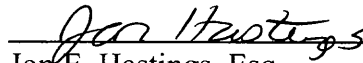
MCI's SUPPLEMENTAL RESPONSE: 4(e) Without waiving its objections to this interrogatory, MCI has provided BellSouth with a list of its "On-Net" collocations. This list identifies the BellSouth wire center buildings that are physically on the network owned by MCI's. Once traffic is delivered to MCI at any of its on-net collocation sites it can be delivered to any other MCI on-net collocation locations without leaving MCI's network. MCI engineers its network to provide services to end user customers. MCI does not engineer its network to move traffic between points on other carriers' (e.g., ILECs') networks. MCI's network is not designed in the point to point architecture contemplated by BellSouth interrogatory number 4(a). MCI's network utilizes SONET fiber rings and there are no beginning ("A") or end ("Z") locations on a circle. Therefore, MCI does not have any additional information responsive to BellSouth interrogatory number 4.


MCI's SUPPLEMENTAL RESPONSE: 4(f) Without waiving its objections to this interrogatory, MCI's ability to "immediately provide transport" between various points on

its network depends on various factors, including customer demand, utilization of existing optronics systems, availability of spare fibers, and so on. MCI has furnished to BellSouth on a confidential basis the number of spare DS-3s in each "on net" collocation. Based on that information, BellSouth can contend that, for any MCI on-net collocation, spare DS-3 capacity exists and could be utilized to meet additional demand up to the DS-3 level.

Response provided by: Objections provided by Counsel. Substantive response provided by Greg Darnell, MCI, 6 Concourse Parkway, Suite 600, Atlanta, Georgia 30328.

Respectfully submitted this 15 day of December, 2003.


Jon E. Hastings, Esq.
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, Tennessee 37219
(615) 252-2306


Kennard B. Woods, Esq. *Permission*
WorldCom, Inc.
Six Concourse Parkway, Suite 600
Atlanta, Georgia 30328
(770) 284-5497

Attorneys for MCImetro Access Transmission
Services, LLC and Brooks Fiber of Tennessee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2003, a copy of the foregoing document was served on the parties of record, via electronically, US mail or hand delivery:

Guy Hicks
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201

Ms. Carol Kuhnaw
Qwest Communications, Inc.
4250 N. Fairfax Dr.
Arlington, VA 22203

Charles B. Welch, Esquire
Farris, Mathews, et. Al
618 Church St., #300
Nashville, TN 37219

Henry Walker, Esq.
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

Dale Grimes, Esq.
Bass, Berry & Sims
315 Deaderick St., #2700
Nashville, TN 37238-3001

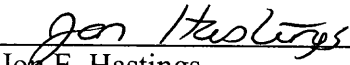
H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave., N. #320
Nashville, TN 37219-1823

Mark W. Smith, Esq.
Strang, Fletcher, et al.
One Union Square, #400
Chattanooga, TN 37402

James Wright, Esquire
United Telephone – Southeast
14111 Capital Blvd.
Wake Forest, NC 27587

Nanette S. Edwards, Esq.
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802

Martha M. Ross-Bain, Esq.
AT&T Communications of the
South Central States, LLC
1200 Peachtree Street, Suite 8100
Atlanta, GA 30309



Jon E. Hastings